

EPA Proposes Cleanup Plan For OMC Plant 2 Site

Outboard Marine Corp. Plant 2 Site

Waukegan, Illinois

August 2008

Share your opinions

If you are interested in the OMC Plant 2 cleanup, please attend the upcoming public meeting on Thursday, Aug. 14, at the Waukegan City Hall City Council Chambers from 6 to 8 p.m. (details on back page.)

Statements on the proposed plan should be submitted during the public comment period that runs Aug. 1 – Sept. 2, 2008:

- Orally or in writing at the public meeting.
- By mail (see enclosed comment form).
- Electronically via the Web at epa.gov/region5/publiccomment/.
- Via fax to Kevin Adler at 312-353-5541.

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Illinois EPA Project Manager 217-785-8725, Tuesday through Friday erin.rednour@illinois.gov U.S. Environmental Protection Agency recently picked from several options its preferred methods for cleaning up contaminated soil and underground water supplies at the OMC Plant 2 site in Waukegan. EPA evaluated seven alternatives for cleaning up the underground water called ground water in environmental terms) under the Plant 2 building. The ground water is contaminated by trichloroethylene or TCE. EPA also considered five alternatives for cleaning up a pool of liquid TCE (called dense non-aqueous phase liquid or DNAPL) found deep in the soil beneath the Plant 2 building.

The dissolved TCE and other contaminants are a potential human health risk should the ground water under the site be used for drinking. The TCE also could give off harmful vapors that could seep into the indoor air of nearby dwellings or buildings on the site if the location is redeveloped. TCE is an oily liquid that is denser than water. When it is spilled, it can make its way to the bottom of a ground-water aquifer and become a long-term source of contamination. DNAPL contamination is often difficult to find and treat, but generally DNAPL must be cleaned up before any ground-water cleanup action is successful.

EPA's preferred cleanup plan includes using an in-place chemical treatment to destroy the pool of liquid TCE in the deep soil. The plan also includes injecting dissolved food material into several areas of the ground water to allow natural micro-organisms in the ground water to distroy the TCE. The preferred cleanup alternative would also use a curtain of air bubbles (called air sparging) to help prevent TCE dissolved in the ground water from moving off-site. The proposed cleanup techniques will protect human health and the environment, provide long-term effectiveness, comply with federal and state environmental regulations and are cost effective.

Before EPA makes a final decision it will accept written public comments on the cleanup plan from Aug. 1 - Sept. 2, 2008. EPA will hold a public meeting from 6 - 8 p.m., Thursday, Aug. 14, at the Waukegan City Hall City Council Chambers to present the proposed plan. Written and oral comments on the proposed plan will be accepted at the meeting. Your opinion counts. Based on public input EPA could modify the preferred cleanup plan or pick another option so your opinion counts.

This proposed plan fact sheet provides background information about the OMC Plant 2 site, describes the various cleanup options considered and identifies EPA's recommended cleanup option. The public is encouraged to review the supporting documents for the OMC Plant 2 site. The information includes reports called the remedial investigation and feasibility study and the site-wide human health and ecological risk assessment report. The remedial investigation studies the nature and extent of contamination at the site, while the feasibility study evaluates different cleanup options. The risk assessment looks at potential health risks to people and wildlife due to contamination at the site.

¹Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA known as the Superfund Law) requires publication of a notice and a proposed plan for the site remediation. The proposed plan must also be made available to the public for comment. This proposed plan fact sheet is a summary of information contained in the remedial investigation, feasibility study, and other documents in the administrative record for the Outboard Marine Corporation Plant 2 site. They are available for review at the Waukegan Public Library, 128 N. County St.

About the OMC site

The OMC Superfund site is located on Seahorse Drive and Waukegan Harbor in Waukegan, Lake County, Ill. (Figure 1). EPA sometimes divides complex cleanups into smaller parts called operable units or OUs. The OMC site contains four OUs. OU1 is the Waukegan Harbor site; OU2 is the Waukegan Manufactured Gas and Coke Plant site; OU3 is the PCB containment cells; and OU4 is the OMC Plant 2 site. The city of Waukegan now owns much of the OMC property.

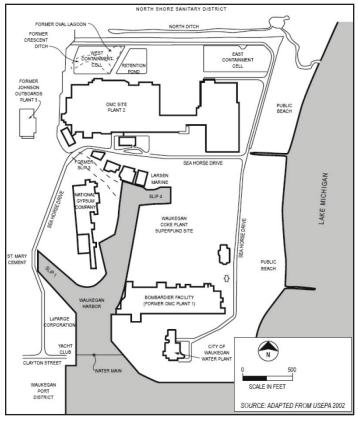


Figure 1 - Site and Area Features

EPA began cleanup work at the OMC Superfund site in the early 1980s. The state had documented PCB contamination in Waukegan Harbor in the mid-1970s, and the site was placed on the first Superfund National Priorities List in October 1981. OMC cleaned up Waukegan Harbor from 1990 to 1992 by dredging the north harbor area and placing the dredged material into former Boat Slip #3 after it was converted into a containment cell. OMC also dug up PCBladen soil on the north side of its Plant 2 property and placed it into two newly created containment cells located on the north side of Plant 2. As part of the harbor cleanup, OMC constructed Boat Slip #4 to replace former Boat Slip #3 for Larsen Marine Service. Some of the soil excavated from Boat Slip #4 contained creosote, leading to the discovery of the long-forgotten Waukegan Coke Plant site. The coke plant area is being cleaned up by several former owner/operators under EPA supervision and is not the

subject of this proposed cleanup plan.

Until it declared bankruptcy in December 2000, OMC was in charge of inspecting and maintaining the three PCB containment cells. EPA and then Illinois EPA performed these tasks until mid-2005 when the city of Waukegan assumed responsibility for this work. The city of Waukegan purchased the Waukegan Coke Plant property from OMC in July 2002. After OMC legally abandoned the OMC Plant 2 property in 2002, the city acquired this property in 2005. The city plans to redevelop these former OMC properties in accordance with the Lakefront Redevelopment Plan it completed in 2003.

The OMC Plant 2 building is a 1-million square foot facility where OMC made outboard motors from about 1948 until 2000. The building was abandoned in December 2002. From 1961 until 1972, the production lines of Plant 2 used hydraulic and lubricating oils containing PCBs. They were the sources of the PCBs in Waukegan Harbor sediment (mud) until OMC plugged its sewer lines in 1976. OMC also used TCE as a parts degreaser. The degreasers and TCE storage tanks are the main sources of the TCE ground-water contamination and the DNAPL beneath the site.

In 2004, EPA studied the nature and extent of soil and ground-water contamination at the OMC Plant 2 facility. The study results were issued in a 2006 remedial investigation report. In 2005, EPA began studying ways to clean up the Plant 2 facility that would protect human health and the environment. The results of this study were issued in 2006 in a feasibility study report. EPA also began a field study of innovative cleanup methods for the ground water and DNAPL in 2006 and completed it this March. EPA used the results to update the ground water and DNAPL remedies evaluated in the feasibility study and issued a feasibility study supplement this July.

EPA's first proposed cleanup plan for the OMC Plant 2 site addressed the contaminants (mostly PCBs) the Agency found within large portions of the OMC Plant 2 building and in soil and sediment outside the facility. EPA issued a document called a record of decision in 2007 that called for EPA to demolish and dispose of the contaminated building and to excavate and dispose of contaminated soil and sediment. EPA will complete the design plans and specifications for this work later this summer.

Summary of site risks

A study of potential risks to public health, wildlife and the environment was done for the OMC Plant 2 site. Ground water and subsurface soil are contaminated with a class of chemicals called volatile organic compounds (known as VOCs) such as TCE and vinyl chloride. If this ground water were used for drinking, it would pose an unacceptable health risk to people. Once the site is

redeveloped, vapors seeping into residential units from the contaminated plume of underground water could also pose unacceptable human health risks. The TCE DNAPL presents a constant source of dissolved TCE in the ground water, leading to the drinking water and inhalation risks.

Figure 2 presents the locations of the affected ground water and the DNAPL areas on the OMC Plant 2 site.

Summary of cleanup options

EPA considered five cleanup options for the DNAPL-contaminated soil deep under the OMC Plant 2 building and seven cleanup options for the ground water. Each option was evaluated against nine criteria as required by the Superfund law (see Page 4). The 12 cleanup options are summarized below. Full details are available in the technical documents on file in the OMC Plant 2 site Administrative Record EPA established at the Waukegan Public Library.

Site related documents may be reviewed at:

Waukegan Public Library Reference Desk 128 N. County St.

EPA Region 5 Record Center 77 W. Jackson Blvd., 7th Floor Chicago, Ill., weekdays 8 a.m. – 4 p.m.

Certain EPA information, including this fact sheet, can be reviewed electronically at: www.epa.gov/region5/sites/outboardmarine.

An administrative record, which contains detailed information upon which the selection of a cleanup plan will be based, is also located at the Waukegan Public Library and at the EPA Chicago office.

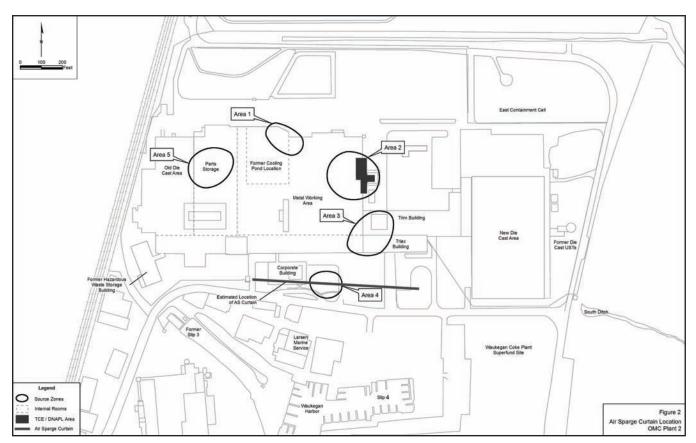


Figure 2 - Black line marks location of air sparge curtain.

Evaluating the options

EPA used the following nine criteria to evaluate each of the options. The tables on Page 7 compare each one against these criteria:

- **1. Overall Protection of Human Health and the Environment** addresses whether an option adequately protects human health and the environment. This criterion can be met by reducing or eliminating contaminants, or by reducing people's exposure to them.
- **2.** Compliance with Applicable or Relevant and Appropriate Requirements, referred to as ARARs, assures that each project complies with federal, state, and local laws and regulations.
- **3. Long-term Effectiveness and Permanence** evaluates how well an option will work in the long term, including how safely remaining contaminants can be managed.
- **4. Reduction of Toxicity, Mobility, or Volume through Treatment** addresses how well the option reduces the harmful effects, movement and amount of contaminants.
- **5. Short-term Effectiveness** is how quickly the cleanup can be done, as well as its potential harm to workers, residents and the environment.
- **6. Implementability** evaluates the technical difficulty in building and operating the cleanup system and whether materials and services are available to carry out the project.
- **7. Cost** includes estimated capital or start-up costs. An example is the cost of buildings, treatment systems and monitoring wells. It also considers cost to implement the cleanup and operate and maintain it over time. Examples include laboratory analysis, repairs and personnel hired to operate equipment. A cleanup is considered cost effective if its costs are proportionate to its overall effectiveness.
- **8. State Acceptance** is whether the state environmental agency, in this case Illinois EPA, agrees with EPA's recommended option.
- **9. Community Acceptance** evaluates how well the community near the site accepts the option. EPA and Illinois EPA will evaluate community acceptance after the public comment period

DNAPL

The DNAPL area outlined in Figure 2 contains an estimated 295,000 pounds of liquid TCE. This is enough TCE to potentially contaminate more than 7 billion gallons of drinking water. EPA considers the liquid TCE to be a major pollution threat, so an active treatment cleanup option would be preferable over passive alternatives for tackling this potential long-term source of ground-water contamination.

Option D1: No further action

EPA uses the no-action option as a basis for comparison with other cleanup options. Under this option, EPA would take no action to remove or contain the liquid TCE in deep soil under the OMC Plant 2 site. The potential health risks due to vapors seeping into residential buildings would remain. The cost to implement this option is the expense related to performing future five-year reviews at the site. **Cost:** \$30,000

Option D2: **Institutional controls and monitoring** Under this option, the liquid TCE would remain as a

constant source of ground-water contamination as in Option D1. EPA would rely on using institutional controls to prevent exposure of residents or site workers to the TCE and monitoring to evaluate whether exposures are occurring. Examples of controls could include welldrilling restrictions to prevent placing water production wells into the DNAPL area. Dwellings may need vapor barriers designed into the foundations to prevent human exposure to TCE vapors given off from the DNAPL and the ground-water contamination. Although no construction activity would be needed for Option D2, it could take a year or more to negotiate institutional controls placement on the OMC Plant 2 property with the current property owner. The estimated cost to implement this option includes periodic monitoring and expenses related to performing five-year reviews at the site. Cost: \$580,000

Option D3: Extraction, collection, and off-site disposal Under Option D3, EPA would install two recovery wells in the DNAPL and periodically pump them to remove liquid TCE from the ground. About 55 gallons of TCE would be recovered every month for the five years of

operation. Afterwards, the wells would be monitored to see if additional TCE could be pumped from the ground. As in Option D2, EPA would rely on institutional controls and monitoring to prevent TCE exposure to residents and site workers. EPA estimates that less than 10 percent of the DNAPL could be removed under this option. The remainder would be a long-term source of ground-water contamination beneath the site. After EPA completed the design stage and when funding was available, construction activity for Option D3 could be completed in about 12 months. The cost includes periodic monitoring and expenses related to five-year reviews at the site.

Cost: \$1.2 million

Option D4: Thermal treatment

Under Option D4, EPA would install thermal units in the ground to generate high temperatures in the DNAPL area. The TCE would be vaporized and collected through soil vapor extraction wells. Recovered TCE would be destroyed on-site in a catalytic oxidizer or afterburner device. About 75 percent of the TCE (more than 200,000 pounds) could be recovered and destroyed in this manner. The remainder would be a long-term source of low-level ground-water contamination beneath the site. EPA would also rely on institutional controls. Option D4 could be completed in about 12 months. The cost includes periodic monitoring and expenses related to five-year reviews at the site. **Cost: \$9.8 million**

Option D5: Chemical reduction (EPA's recommended cleanup option)

The cleanup plan under Option D5 is similar to Option D4 in that about 75 percent of the TCE would be destroyed. EPA would again rely on institutional controls and monitoring to prevent exposure to residents and site workers. Option D5, however, also uses conventional soil mixing equipment to blend chemical treatments such as zero-valent iron (ZVI) and bentonite clay into the TCE DNAPL. The iron corrodes in the ground water and releases hydrogen gas. The hydrogen in turn destroys the liquid TCE by causing a process called dechlorination. The clay helps to create a barrier to ground-water flow which isolates any remaining TCE. Completion of the TCE destruction step could occur in as few as six months after the ZVI was injected into the soil. EPA would then periodically monitor the area. The cost includes periodic monitoring and expenses related to five-year reviews at the site. Cost: \$2 million

Ground Water

The aquifer beneath the site is currently not used for drinking water. However, it could be used as such if it was not contaminated with TCE and vinyl chloride. EPA policy suggests active treatment methods be used to restore the aquifer to drinking water standards if practicable. The Safe

Drinking Water Act sets "maximum contaminant levels" or MCLs for these pollutants. However, the nature of ground-water contamination is usually such that no matter what treatment method is employed to reach the MCL, final recovery time will be very long. Also, EPA would not recommend that active ground-water cleanup methods be conducted at the site unless the TCE DNAPL is also reduced.

Option G1: No further action

EPA uses the no-action option as a basis for comparison with other cleanup options. The potential health risks due to drinking contaminated water or from vapors seeping into residential buildings would remain. The cost to implement this option is the expense related to performing future five-year reviews at the site. **Cost:** \$30,000

Option G2: Monitored natural attenuation and institutional controls

As in the DNAPL options, EPA would rely on institutional controls to prevent exposure of residents or site workers to the TCE and monitoring to evaluate whether exposures are occurring. Dwellings may need vapor barriers designed into the foundations to prevent human exposure to TCE vapors given off from the DNAPL and the groundwater contamination. Also under this option, EPA would rely on "monitored natural attenuation" to clean up the contaminant plume. Natural attenuation uses processes such as evaporation, decay and dilution to reduce pollutant levels. EPA would monitor ground water in a 30-well network at the site to track how well natural attenuation is working. High TCE and vinyl chloride levels would likely persist in the site ground water for many decades under this approach, especially if the associated TCE DNAPL is not cleaned up. The estimated cost includes periodic monitoring and expenses related to performing five-year reviews at the site. Cost: \$1.1 million

Option G3: Treatment of TCE

Under this option, EPA would use active treatment methods to lower the contaminant levels in the ground-water plume without having to pump any water from the ground. Three different methods were considered – one chemical option and two "bioremediation" alternatives. Bioremediation uses micro-organisms to reduce pollutant levels. Each method is intended to accelerate dechlorination of the TCE. This process could occur chemically using zero-valent iron injected into the plume. Alternatively, the addition of carbon sources such as a soluble growing medium or edible oil medium would lead to an increase in bacteria, which would consume the TCE.

Each treatment method could reduce the estimated mass of TCE dissolved in ground water by up to 96 percent. Afterwards, monitored natural attenuation would be used to track the reduction of the plume for several decades

until cleanup goals are met. Also under this option, EPA would use institutional controls and monitoring to prevent exposure. Estimated cost includes periodic monitoring and expenses related to five-year reviews at the site.

Option G3a: Chemical reduction

Construction activity for Option G3a could be completed in less than a year. **Cost: \$9.6 million**

Option G3b: Enhanced bioremediation with soluble growing medium (*EPA's recommended cleanup option*) Injection activity for Option G3b could be completed over the course of several years.

Cost: \$8.3 million

Option G3c: Enhanced bioremediation with food-grade oil

Injection activity for Option G3c could be completed over the course of several years. Cost: \$11.2 million

Option G4: Ground water pump-and-treat

Under Option G4, EPA would use conventional ground water pump-and-treat technology to lower the contaminant levels in the plume. EPA evaluated one method that could remove about 96 percent of the TCE dissolved in the ground water and another that would remove up to 99 percent. Upon completing active cleanup work, EPA would use monitored natural attenuation to track the final reduction of the plume for several years until final cleanup goals are met. EPA would also rely on institutional controls and monitoring to prevent exposure. Estimated cost includes periodic monitoring and expenses related to five-year reviews at the site.

<u>Option G4a</u>: **Ground water pump-and-treat** (partial removal)

The pump-and-treat system would be operated for up to 10 years to achieve up to 96 percent removal of TCE from the ground water. Monitored natural attenuation would then be used to track pollution levels in the plume for several decades until cleanup targets are reached. **Cost: \$8 million**

Option G4b: Ground water pump-and-treat (longer cleanup)

The pump-and-treat system would be operated for up to 20 years to achieve a 99 percent removal level of the TCE. Monitored natural attenuation would be used to track the final cleanup of the plume for a decade or less until goals are reached. **Cost: \$10.6 million**

Option G5: Thermal treatment

Under Option G5, EPA would use thermal units to heat up the ground water to vaporize the TCE to a gas, which is then captured using soil vapor extraction equipment. This treatment process uses vacuum wells to remove hazardous gases from the soil. The captured TCE gas would be thermally oxidized before it is exhausted to

the atmosphere. The system would be run for about 24 months and remove about 96 percent of the dissolved TCE mass. Upon completing active cleanup work, EPA would switch to monitored natural attenuation. EPA would also rely on institutional controls and monitoring to prevent exposure. The estimated cost includes periodic monitoring and expenses related to performing five-year reviews at the site. **Cost: \$37.8 million**

The following alternatives were evaluated for potential use with Options G2, G3, or G5:

Option G6: Permeable reactive barrier

In this option, EPA would install a permeable reactive barrier on the southern boundary of the property to treat dissolved TCE as the ground water moves off-site toward the harbor. The barrier consists of a trench about 800 feet long, 30 feet deep, and 1 to 2 feet thick and be filled with zero-valent iron. The ZVI would react with the TCE in the ground water as it flowed through the barrier. This would reduce TCE concentrations to meet cleanup standards before the ground water moved off-site. Estimated cost includes periodic monitoring and five-year reviews.

Cost: \$6.2 million

Option G7: Air sparge curtain (*EPA's recommended cleanup option*) Under Option G7, EPA would install an air sparge curtain system along the southern boundary of the site to help remove dissolved TCE as the ground water moves toward the harbor. The curtain would consist of a 1,000-foot slotted pipe horizontally drilled into the aquifer. Air would be pumped through the slots that causes dissolved TCE to vaporize out of the ground water. It would not be necessary to capture the TCE for treatment because pollution concentrations would be low. The system would be operated for about 30 years. Estimated cost includes periodic monitoring and five-year reviews. **Cost: \$2.4 million**

How do the options compare?

EPA evaluated the cleanup options against seven of the nine cleanup criteria. The state and community acceptance criteria will be evaluated after EPA receives public comments. The degree to which the cleanup options meet the evaluation criteria and how they compare to other cleanup options are discussed below and illustrated in the tables on Page 7.

Options D1 and G1 (no action) do not protect human health and the environment and were rejected. Options D2 and G2 rely on very long-term natural reduction of contaminants to reach cleanup levels and on institutional controls in the interim to protect people. Option D3 removes very little DNAPL from the ground in comparison to Options D4 and D5. While both Options D4 and D5 are effective at removing a large quantity of DNAPL from the environment, Option D4 is much more costly to implement than Option D5. Option D5 also

ties up any remaining TCE in the ground so it cannot be dissolved into the ground water.

Options G3, G4 and G5 are almost equally effective at removing ground-water contaminants. However, Option G3 is potentially less costly and easier to implement than Options G4 and G5. Of the three potential Option G3 choices, Option G3b is the least expensive method. Implementing Option G7, which is less expensive than Option G6, in concert with Option G3b helps prevent ground-water contamination from moving off-site while cleanup work is ongoing.

EPA's recommended option and next steps

Based on the analysis completed to date, EPA believes the best cleanup options for the ground water and DNAPL contamination under the OMC Plant 2 site are Options D5

and Options G3b and G7. Figure 2 presents the proposed construction locations for these options. The total cost of conducting the ground-water and DNAPL cleanups at the site using the recommended options is estimated at \$12.7 million.

After the public comment period and meeting EPA will make a final decision on the cleanup options. The Agency will publish its decision in a newspaper announcement and in a document called a record of decision or ROD. The ROD will be available for review at the Waukegan Public Library.

Construction work on these preferred options could then begin about a year later, but achieving final ground-water cleanup levels will take decades after active treatment has ceased. EPA and the state will be charged with future inspection and maintenance tasks to ensure the groundwater remedies operate properly until the cleanup work is completed.

Evaluation criteria for the cleanup of soil under the OMC Plant 2 Site

Criterion	D1	D2	D3	D4	D5*
Overall protection of human health and the environment					
Meets ARARs	•	•	•	-	-
Long-term effectiveness and permanence					
Reduction of toxicity, mobility, or volume through treatment					•
Short-term effectiveness			18-24 months to complete	12 months to com- plete	6-12 months to complete
Implementability	•	•	•	•	•
Cost (Present worth)	\$30,000	\$580,000	\$1.16 million	\$9.75 million	\$1.98 million
State acceptance	Will be evaluated after the public comment period				

■Fully meets criteria

■Partially meets criteria

□Does not meet criteria

*EPA's recommended option

Evaluation criteria for ground water under the OMC Plant 2 site

Criterion	G1	G2	G3*	G4	G5	G6	G7*
Overall protection of human health and the environment							
Meets ARARs	•	•	-	-	•	-	-
Long-term effectiveness and permanence			•		•	•	•
Reduction of toxicity, mobility, or volume through treatment							
Short-term effectiveness			1-4 years to complete	10-20 years to complete	1-2 years to complete	12 months to install	12 months to install
Implementability	•	•	•	•	•	•	•
Cost (Present worth)	\$30,000	\$1.1 million	\$8 million-\$11 million	\$8 million- \$10 million	\$37.5 million	\$6.2 million	\$2.4 million
State acceptance	Will be evaluated after the public comment period						

Fully meets criteria

■Partially meets criteria

□Does not meet criteria

EPA PROPOSES CLEANUP PLAN FOR OMC PLANT 2 SITE

United States
Environmental Protection
Agency
Region 5
77 W. Jackson Blvd.
Chicago, IL 60604



FIRST CLASS

You're Invited to a Public Meeting about the Proposed Cleanup for OMC Plant 2 Site

Thursday, Aug. 14, 2008
6 - 8 p.m.
Waukegan City Hall - City Council Chambers
100 N. Martin Luther King Jr. Ave.

Waukegan

At the meeting, EPA will present the proposed cleanup plan, and you will have a chance to comment for the record. You also may submit your written comments at the meeting.

If you need special accommodations for the public meeting, contact Mike Joyce at the contact information on Page 1 by Aug. 12.

If you have scientific and technical questions about the proposed cleanup, you may contact EPA Remedial Project Manager Kevin Adler at the contact information on Page 1.

Comments may be faxed to Kevin Adler at 312-353-5541 or submitted via the Web at: epa.gov/region5/publiccomment/.

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	Kevin Adler
	Remedial Project Manager EPA Region 5 (SR-6J)

Chicago, IL 60604-3590

Comment Sheet —		
U.S. Environmental Protection Agency is interested in site. EPA will consider public comments before selection to write your comments, then fold and mail this form. general questions, contact Mike Joyce at 312-353-554 submit your comments to EPA via the Web at epa.gov.	ing a cleanup action for the Pl Comments must be postmarked, or through EPA's toll-free m	ant 2 site. Please use the space below ed by Sept. 2, 2008. If you have
	Name	
	Address	
	City	
	Zip	